

Hovey Williams LLP
10801 MASTIN BOULEVARD
SUITE 1000
OVERLAND PARK, KANSAS 66210
TELEPHONE (913) 647-9050
FAX (913) 647-9057

Cheryl L. Burbach (Admitted Pro Hac Vice)
Email cburbach@hoveywilliams.com
Dianne M. Smith-Misemer (Pro Hac Vice Application Pending)
Email dsmisemer@hoveywilliams.com

Davis Wright Tremain LLP
865 S. FIGUEROA ST.
SUITE 2400
LOS ANGELES, CALIFORNIA 90017-2566
TELEPHONE (213) 633-6800
FAX (213) 633-6899

Sean Sullivan (State Bar No. 229104)
Email seansullivan@dwt.com

Attorneys for Plaintiff
SILPADA DESIGNS, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

SILPADA DESIGNS, INC.,
Plaintiff,
vs.
CLAIRE SANTANIELLO,
Defendants.

Case No. 2:15-cv-03636-SJO-SSx

DISCOVERY MATTER

**PLAINTIFF'S NOTICE OF MOTION
TO COMPEL DISCOVERY
RESPONSES**

Hearing Date: March 1, 2016

Hearing Time: 10:00 a.m.

Location: Courtroom 590

Hon. Suzanne H. Segal

Discovery Cutoff: June 20, 2016

Pretrial Conference: September 12, 2016

Trial Date: September 20, 2016

Complaint Filed: May 19, 2015

1 TO THE COURT AND DEFENDANT:

2 PLEASE TAKE NOTICE that on Tuesday, March 1, 2016 at 10:00 a.m., in
 3 Courtroom 590, United States Courthouse, Roybal Federal Building, located at 255
 4 East Temple Street, Los Angeles, CA 90012, Plaintiff Silpada Designs, Inc.
 5 (“Silpada”) will and hereby does move this Court for an Order requiring Defendant
 6 Claire Santaniello (“Santaniello”) to: (a) treat Silpada’s First Set of Interrogatories
 7 (“Interrogatories”) Nos. 2, 4, 10-12, 15 and 17-22 as single interrogatories; (b)
 8 provide substantive responses to Interrogatories Nos. 1-24; (c) immediately produce
 9 documents in response to Silpada’s First Set of Requests for Production of
 10 Documents (“Requests”) Nos. 1-66 or, in the alternative, confirm that no such
 11 documents exist; (d) produce all purportedly confidential information in a manner
 12 that provides access to Silpada’s in-house legal team; (e) withdraw all objections that
 13 Santaniello raised after she served her initial written discovery responses on October
 14 2, 2015; and (f) enter Silpada’s proposed Joint Protective Order, attached as Exhibit
 15 26 to the Declaration of Sean Sullivan.

16 This Motion is made following the conference of counsel pursuant to L.R. 37-
 17 1, which took place on October 19, 2015 and December 18, 2015.

18 The Motion will be based on this Notice, the Joint Stipulation prepared by the
 19 parties pursuant to L.R. 37-2, as well as supporting declarations and exhibits, the files
 20 and records in this action, and any further evidence or argument that this Court may
 21 properly receive at or before the hearing.

22 DATED: February 4, 2016

DAVIS WRIGHT TREMAINE LLP

23 s/ Sean M. Sullivan

24 Sean M. Sullivan

25 HOVEY WILLIAMS LLP

26 Cheryl L. Burbach

27 ATTORNEYS FOR SILPADA DESIGNS, INC.
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